

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 20-0249 RS
)	
Plaintiff,)	RECORDED NOTICE OF PENDENCY OF
)	ACTION (LIS PENDENS) AS TO REAL
v.)	PROPERTY AND IMPROVEMENTS LOCATED
)	AT 9414 PLAZA POINT DRIVE, MISSOURI CITY,
ROWLAND MARCUS ANDRADE,)	TEXAS, 77459 (APN R464607)
)	
Defendant.)	
)	

The United States hereby submits the attached Recorded Notice of Lis Pendens as to Real Property and Improvements located at 9414 Plaza Point Drive, Missouri City, Texas, 77459. (APN R464607)

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

Dated: 07/16/2020

/S/ Chris Kaltsas
CHRIS KALTSAS
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of

- Recorded Notice of Pendency of Action (Lis Pendens) as to Real Property and Improvements located at 9414 Plaza Point Drive, Missouri City, Texas, 77459 APN R464607

to be served this date via United States certified and first class mail delivery upon the person(s) below at the place(s) and address(es) which is the last known address(es):

Jerrell G. Clay
1600 Highway 6, Suite 400
Sugarland, TX 77478
(713) 705-4220

Recovco Mortgage Management, LLC dba
Sprout Mortgage
4600 Fuller Drive, Suite 350
Irving, TX 75038

Soimaz Andrade
9414 Plaza Point Drive
Missouri City, Texas, 77459

Sienna Plantation Residential Association
9600 Scanlan Trace
Missouri City, TX 77459

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 17 day of July, 2020, at San Francisco, California



Hector Lopez
Supervisory Legal Administrative Specialist
United States Attorneys' Office

2020088030

ELECTRONICALLY RECORDED

Official Public Records

7/15/2020 1:57 PM



Laura Richard, County Clerk

Fort Bend County Texas

Pages: 17

Fee: \$ 80.00

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6 San Francisco, California 94102-3495
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9 Email: chris.kaltsas2@usdoj.gov

Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	CASE NO. CR 20-00249 RS
14 Plaintiff,)	
15 v.)	NOTICE OF PENDENCY OF ACTION
16 ROWLAND MARCUS ANDRADE,)	(LIS PENDENS) AS TO REAL PROPERTY AND
17 Defendant.)	IMPROVEMENTS LOCATED 9414 PLAZA POINT
)	DRIVE, MISSOURI CITY, TEXAS, 77459 (APN
)	R464607)
)	Owners of Record: Rowland Marcus Andrade,
)	Soimaz Andrade

19 NOTICE IS HEREBY GIVEN that an action has been commenced in the above-entitled Court
20 pursuant to an Indictment, a copy of which is attached hereto as Exhibit A, filed by the United States of
21 America on June 22, 2020, to secure judicial forfeiture of real property and improvements located at 9414
22 Plaza Point Drive, Missouri City, Texas, 77459 (APN R464607) situated in Fort Bend County, State of
23 Texas and further described in Exhibit B, which is attached hereto.

24 The Indictment alleges that the real property located at 9414 Plaza Point Drive, Missouri City,
25 Texas, 77459 is subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C)
26 and 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1).

27 The owners of record to the said real property are Rowland Andrade and Soimaz Andrade,
28

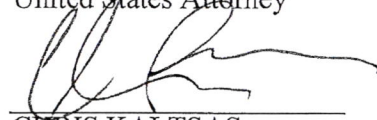
Notice of Lis Pendens at 9414 Plaza Point Dr.
CR 20-00249 RS

1 husband and wife.

2 DATED: *July 14, 2020*

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney



CHRIS KALTSAS
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that he caused a copy of

- Notice of Pendency of Action (Lis Pendens) as to Real Property and Improvements located at 9414 Plaza Point Drive, Missouri City, Texas, 77459

to be served this date via certified mail delivery and first class mail delivery upon the person(s) below at the place(s) and address(es) which is the last known address(es):

Jerrell G. Clay
1600 Highway 6, Suite 400
Sugarland, TX 77478
(713) 705-4220

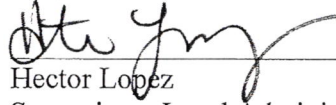
Soimaz Andrade
9414 Plaza Point Drive
Missouri City, Texas, 77459

Recovco Mortgage Management, LLC dba
Sprout Mortgage
4600 Fuller Drive, Suite 350
Irving, TX 75038

Sienna Plantation Residential Association
9600 Scanlan Trace, Missouri City, TX 77459

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 14 day of July, 2020, at San Francisco, California



Hector Lopez
Supervisory Legal Administrative Specialist
United States Attorneys' Office

EXHIBIT A

Case 3:20-[REDACTED] 1 of 9

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

CR20-249 RS

VENUE: SAN FRANCISCO

FILED

Jun 22 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,
V.

ROWLAND MARCUS ANDRADE,

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 1343 – Wire Fraud;
18 U.S.C. § 2 – Aiding and Abetting
18 U.S.C. § 1956(a)(1) – Money Laundering;
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Grand Jury Foreperson

Foreman

Filed in open court this 18th day of

June, 2020

Virginia K. DeMarchi

Clerk

Bail, \$ no bail warrant

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 2 of 9

FILED

Jun 22 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ROWLAND MARCUS ANDRADE,

15 Defendant.

) CASE NO. CR20-249 RS

) VIOLATIONS:

) 18 U.S.C. § 1343 – Wire Fraud;

) 18 U.S.C. § 2 – Aiding and Abetting;

) 18 U.S.C. § 1956(a)(1) – Money Laundering;

) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
Forfeiture Allegation

) SAN FRANCISCO VENUE
16)
17)

18
19 INDICTMENT

20 The Grand Jury charges:

21 Introductory Allegations

22 At all times relevant to this Indictment:

23 1. Defendant ROWLAND MARCUS ANDRADE, also known as MARCUS ANDRADE,
24 was a resident of Missouri City, Texas. ANDRADE was the founder and principal of the entity NAC
25 Foundation, LLC, which was also referred to as the National AtenCoin Foundation. The stated purpose
26 of the NAC Foundation was to develop and manage a new cryptocurrency called AML Bitcoin.
27 ANDRADE claimed to be the creator of the cryptocurrency AML Bitcoin and inventor of AML Bitcoin
28

INDICTMENT

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1 technology. Prior to soliciting purchasers and raising money for the AML Bitcoin project beginning in
2 about 2017, ANDRADE created and sold other purported cryptocurrencies called "Black Gold Coin"
3 and "AtenCoin."

4 2. CO-SCHEMER A worked with ANDRADE to promote AML Bitcoin. CO-SCHEMER
5 A worked on marketing and public relations for AML Bitcoin.

6 Definitions

7 3. The term "cryptocurrency" refers to a class of financial instruments that allow the
8 transfer of value between individuals without any third-party mediation or government regulation. This
9 transfer is accomplished with a set of cryptographic protocols executed entirely over the Internet. These
10 protocols require that each transaction's sender and receiver hold an appropriate cryptographic key.
11 Cryptocurrency was invented in approximately 2009, and examples of cryptocurrencies in widespread
12 use include Bitcoin, Ethereum, and Litecoin.

13 4. The term "initial coin offering," or "ICO," refers to the initial sale of a cryptocurrency to
14 the public. An ICO is similar to an "initial public offering" of stock, a transaction that raises money for a
15 private company and begins the public trading of the company's stock. The purpose of an ICO is to
16 raise money by selling either units of cryptocurrency, or "tokens" that act as placeholders that can later
17 be exchanged for the cryptocurrency, and the money raised is typically used to fund the business or
18 entity developing the new cryptocurrency.

19 AML Bitcoin and the NAC Foundation

20 5. NAC Foundation filed incorporation documents with the Nevada Secretary of State on
21 February 13, 2014. The incorporation documents indicate that ANDRADE is an officer of the NAC
22 Foundation, and NAC Foundation materials identify ANDRADE as its chief executive officer.

23 6. The AML Bitcoin "White Paper," a document dated October 4, 2017, was posted on the
24 AML Bitcoin website by ANDRADE and the NAC Foundation. The White Paper stated that the NAC
25 Foundation created two cryptocurrencies, AML Bitcoin and its predecessor AtenCoin. In the White
26 Paper, the NAC Foundation claimed AML Bitcoin cryptocurrency would include features that would
27 allow the cryptocurrency to comply with anti-money laundering (also referred to as "AML") and know-
28 your-customer ("KYC") regulations and laws by using "biometric technologies" among other methods

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 4 of 9

1 to confirming the identities of participants in transactions using AML Bitcoin. The White Paper stated
2 that ANDRADE sought to raise up to \$100 million from the public sale of AML Bitcoin tokens.

3 7. Beginning in about 2017, ANDRADE began raising money by selling AML Bitcoin
4 tokens. Purchasers of the AML Bitcoin tokens were told that once the AML Bitcoin technology was
5 developed and functioning the tokens would be converted to the actual AML Bitcoin cryptocurrency.
6 Beginning in October 2017 and continuing through about February 2018, ANDRADE and the NAC
7 Foundation conducted what they called the AML Bitcoin initial coin offering, or ICO. After the ICO
8 ended in about February 2018, ANDRADE, NAC Foundation, and his associates continued to solicit
9 purchasers for AML Bitcoin tokens.

10 8. ANDRADE made, reviewed, and approved statements issued by the NAC Foundation
11 regarding AML Bitcoin, including press releases that were posted on the AML Bitcoin website and
12 distributed through newswire services, posts on social media including Twitter, discussion forums, and
13 other information posted on the AML Bitcoin website, among others venues.

14 THE SCHEME AND ARTIFICE TO DEFRAUD

15 9. Beginning at a date unknown to the grand jury, but no later than July 2017, and
16 continuing through a date unknown to the grand jury, but to at least December 2018, ANDRADE
17 knowingly and with the intent to defraud participated in, devised, and intended to devise a scheme and
18 artifice to defraud as to a material matter, and to obtain money and property by means of materially false
19 and fraudulent pretenses, representations, and promises, and by means of omission and concealment of
20 material facts. As part of the scheme to defraud, ANDRADE, individually and through the NAC
21 Foundation, an entity he controlled, committed or caused to be committed by others, including CO-
22 CONSPIRATOR A, the following acts, among others:

23 a) ANDRADE, NAC Foundation, and his associates made public statements and
24 statements to potential purchasers of AML Bitcoin tokens that misrepresented the state of the
25 development of the technology and the viability and timeline for the final release of the
26 functional AML Bitcoin cryptocurrency. ANDRADE and his associates repeatedly stated that
27 the conversion of the token to the AML Bitcoin and the launch of the cryptocurrency, with the
28 promised AML and KYC compliant biometric verification, would be completed in six months.

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 5 of 9

1 b) ANDRADE orchestrated and approved a false “rejection campaign” regarding a
2 purported advertisement that ANDRADE and his associates stated was to going to be aired
3 during the 2018 Super Bowl. ANDRADE, NAC Foundation, and his associates claimed that the
4 advertisement would have aired during the Super Bowl if the television network airing the Super
5 Bowl and the National Football League had not rejected the advertisement as being too
6 controversial. In fact, the NAC Foundation did not have the funds to purchase the advertising
7 time, and the advertisement was never reviewed or rejected by the network or the NFL.

8 c) ANDRADE, NAC Foundation, and his associates made statements that falsely
9 stated and implied that the NAC Foundation had reached or was about to finalize agreements
10 with various government agencies for the use of AML Bitcoin or AML Bitcoin technology, in
11 order make prospective purchasers believe that the cryptocurrency was progressing toward
12 widespread adoption. For example, NAC Foundation announced on or about November 8, 2019
13 stating that ANDRADE and NAC Foundation representatives were “engaged in talks” with the
14 government of Panama and the Panama Canal Authority regarding adoption of the AML Bitcoin
15 cryptocurrency for payment of transit fees. This statement overstated the significance and
16 outcome of meetings and conversations with the Panama Canal Authority. In another example,
17 ANDRADE made false statements regarding a meeting with an elected politician representing
18 the State of California, claiming that ANDRADE had a meeting with the official and discussed
19 “AML Bitcoin and how it can bring security and compliance to crypto, fintech and digital
20 identities.” In fact, ANDRADE was present at a roundtable discussion and had his photograph
21 taken with the official, but AML Bitcoin was not discussed.

22 d) ANDRADE misappropriated money he obtained through the sale of AML Bitcoin
23 tokens, including from a person known to the grand jury and identified as PURCHASER-1,
24 including using more than \$730,000 to purchase a new home that was purchased by ANDRADE
25 and his spouse, and using more than \$220,000 to purchase a piece of real estate held in the name
26 of a company controlled by ANDRADE. Prospective purchasers, including PURCHASER-1,
27 believed that money paid to purchase AML Bitcoin tokens would be spent to develop the
28 technology and for business operations.

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 6 of 9

1 COUNT ONE: (18 U.S.C. §§ 1343 AND 2 – Wire Fraud)

2 Paragraphs 1 through 6 of this Indictment are re-alleged and incorporated as if fully set forth
3 here.

4 Beginning on or about July 2017 and continuing through on or about October 2018, in the
5 Northern District of California and elsewhere, the defendant,

6 ROWLAND MARCUS ANDRADE,

7 with others known and unknown to the Grand Jury, including CO-SCHEMER A, did knowingly and
8 with the intent to defraud participated in, devised, and intended to devise a scheme and artifice to
9 defraud as to a material matter, and to obtain money and property by means of materially false and
10 fraudulent pretenses, representations, and promises, and by means of omission and concealment of
11 material facts.

12 THE USE OF THE WIRES

13 On or about January 12, 2018, in the Northern District of California and elsewhere, for the
14 purpose of executing the aforementioned scheme and artifice to defraud and attempting to do so, the
15 defendant,

16 ROWLAND MARCUS ANDRADE,

17 did knowingly transmit and cause to be transmitted in interstate and foreign commerce, by means of a
18 wire communication, certain writings, signs, signals, pictures, and sounds, specifically, a wire transfer of
19 in the amount of \$730,000 originating from a bank account in the Northern District of California
20 controlled by a person known to the grand jury and identified as PURCHASER-1 using the Fedwire
21 Funds Service.

22 All in violation of Title 18, United States Code, Sections 1343 and 2.

23 COUNT TWO: (18 U.S.C. § 1956(a)(1)(A)(i) and (a)(1)(B)(i) – Money Laundering)

24 Paragraphs 1 through 6 of this Indictment are re-alleged and incorporated as if fully set forth
25 here.

26 On or about March 7, 2018, in the Northern District of California and elsewhere, the defendant,

27 ROWLAND MARCUS ANDRADE,
28

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 7 of 9

1 did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign
 2 commerce which involved the proceeds of a specified unlawful activity, that is wire fraud in violation of
 3 Title 18, United States Code, Section 1343, with the intent to promote the carrying on of said specified
 4 unlawful activity, and knowing that the transaction was designed in whole and in part to conceal and
 5 disguise the nature, location, source, ownership, and proceeds of said specified unlawful activity, and
 6 that while conducting and attempting to conduct such financial transaction, knew that the property
 7 involved in the financial transaction represented the proceeds of some form of unlawful activity; that is,
 8 the purchase of a cashier's check drawn on an account held in the name of Fintech Fund Family LP
 9 involving \$600,000 in United States Currency later deposited in an account in the name of MARCUS
 10 ANDRADE.

11 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), and 2.

12 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c);

13 18 U.S.C. § 982(a)(1))

14 The allegations contained in this Indictment are re-alleged and incorporated by reference for the
 15 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title
 16 28, United States Code, Section 2461(c); and Title 18, United States Code, Section 982(a)(1).

17 Upon conviction of Count One of this Indictment, the defendant,

18 ROWLAND MARCUS ANDRADE,

19 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
 20 Title 28, United States Code, Section 2461(c), all property, real or personal, constituting or derived from
 21 proceeds the defendant obtained, directly or indirectly, that are traceable to his violation of Title 18,
 22 United States Code, Section 1343.

23 Upon conviction of Count Two of this Indictment, the defendant,

24 ROWLAND MARCUS ANDRADE,

25 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any
 26 property, real or personal, involved in the violation alleged in Count Two, or any property traceable to
 27 such property, including, but not limited to:

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 8 of 9

- 1 a. One Parcel of Real Property Located at 9414 Plaza Point Drive, Missouri City, Texas,
2 77459

3 If the property described above, as a result of any act or omission of the defendant:

- 4 a. cannot be located upon exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the court;
7 d. has been substantially diminished in value; or
8 e. has been commingled with other property which cannot be divided without
9 difficulty,

10 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
11 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

12 All pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code,
13 Section 2461(c); Title 18, United States Code, Section 982(a)(1); and Federal Rule of Criminal
14 Procedure 32.2.

15
16 DATED: June 18, 2020

A TRUE BILL.

17
18 /s/
19 _____
FOREPERSON

20 DAVID L. ANDERSON
21 United States Attorney

22 /s/ Lloyd Farnham
23 _____
24 LLOYD FARNHAM
ANDREW DAWSON
Assistant United States Attorneys

25
26
27
28
INDICTMENT

AO 257 (Rev. 6/78)

Case 3:20-cr-00249-RS Document 1 Filed 06/22/20 Page 9 of 9

FILED

Jun 22 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

COUNT ONE:
18 U.S.C. § 1343 - Wire Fraud

COUNT TWO:
18 U.S.C. § 1956(a)(1) - Money Laundering

PENALTY: CT ONE: 20 yrs imprisonment, fine of \$250,000 (or twice the gross gain or loss, whichever is greater), 3 yrs supervised release, \$100 special assessment; CT TWO: 20 yrs imprisonment, fine of \$500,000 (or twice the value of property involved, whichever is greater), 3 yrs supervised release, \$100 special assessment

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Name of District Court, i
NORTHERN DIS
SAN FRA

DEFENDANT - U.S.

▶ ROWLAND MARCUS ANDRADE

DISTRICT COURT NUMBER

CR20-249RS

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Internal Revenue Service-Criminal Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person
Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
Attorney (if assigned) LLOYD FARNHAM

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.
1) ☒ If not detained give date any prior summons was served on above charges ▶

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge

5) ☐ On another conviction } ☐ Federal ☐ State

6) ☐ Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
been filed? ☐ No

If "Yes"
give date
filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

Case 3:20-cr-00249-RS Document 1-1 Filed 06/22/20 Page 1 of 1

FILED

Jun 22 2020

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. ROWLAND MARCUS ANDRADE

CASE NUMBER:

CR 20-249RS

Is This Case Under Seal?Yes ☒ No**Total Number of Defendants:**1 ☒ 2-7 8 or more**Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**Yes No ☒**Venue (Per Crim. L.R. 18-1):**SF ☒ OAK SJ**Is this a potential high-cost case?**Yes No ☒**Is any defendant charged with a death-penalty-eligible crime?**Yes No ☒**Is this a RICO Act gang case?**Yes No ☒**Assigned AUSA**

(Lead Attorney): Lloyd Farnham

Date Submitted: 6/18/2020**Comments:**

EXHIBIT B

EXHIBIT B (LEGAL DESCRIPTION)

LOT 8, BLOCK 1, SIENNA VILLAGE OF DESTREHAN SECTION 9B, A SUBDIVISION IN FORT BEND COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN PLAT NO. 20170063, MAP AND/OR PLAT RECORDS, FORT BEND COUNTY, TEXAS.

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

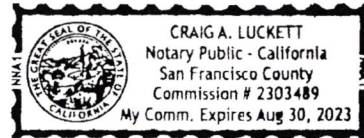
State of California
County of San Francisco)

On July 14, 2020 before me, Craig A. Luckett, Notary Public
(insert name and title of the officer)

personally appeared Chris Kaltsas,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing
paragraph is true and correct.

WITNESS my hand and official seal.



Signature Craig Luckett (Seal)